

PUBLIC DISCLOSURE

OCTOBER 29, 2014

**MORTGAGE LENDER COMMUNITY INVESTMENT
PERFORMANCE EVALUATION**

LEADER MORTGAGE COMPANY INC.

ML2619

**180 MASSACHUSETTS AVENUE
ARLINGTON, MA. 02474**

**DIVISION OF BANKS
1000 WASHINGTON STREET
BOSTON MA. 02118**

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| NOTE: | This evaluation is not, nor should it be construed as, an assessment of the financial condition of this mortgage lender. The rating assigned to this mortgage lender does not represent an analysis, conclusion or opinion of the Division of Banks concerning the safety and soundness of this mortgage lender. |
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GENERAL INFORMATION

Massachusetts General Laws chapter 255E, section 8 and the Division of Banks' (Division) regulation 209 CMR 54.00, Mortgage Lender Community Investment (CRA), require the Division to use its authority when examining mortgage lenders subject to its supervision who have made 50 or more home mortgage loans in the last calendar year, to assess the mortgage lender's record of helping to meet the mortgage credit needs of the Commonwealth, including low- and moderate-income neighborhoods and individuals, consistent with the safe and sound operation of the mortgage lender. Upon conclusion of such examination, the Division must prepare a written evaluation of the mortgage lender's record of meeting the credit needs of the Commonwealth.

This document is an evaluation of the CRA performance of **Leader Mortgage Company Inc. (the Lender or Leader Mortgage)** prepared by the Division, the mortgage lender's supervisory agency, as of **October 29, 2014**.

SCOPE OF EXAMINATION

An onsite evaluation was conducted using examination procedures, as defined by CRA guidelines. A review of the Division's records, as well as the mortgage lender's public CRA file, did not reveal any complaints.

The CRA examination included a comprehensive review and analysis, as applicable, of Leader Mortgage's:

- (a) origination of loans and other efforts to assist low and moderate income residents, without distinction, to be able to acquire or to remain in affordable housing at rates and terms that are reasonable considering the Lender's history with similarly situated borrowers, the availability of mortgage loan products suitable for such borrowers, and consistency with safe and sound business practices;
- (b) origination of loans that show an undue concentration and a systematic pattern of lending resulting in the loss of affordable housing units;
- (c) efforts working with delinquent residential mortgage customers to facilitate a resolution of the delinquency; and
- (d) other efforts, including public notice of the scheduling of examinations and the right of interested parties to submit written comments relative to any such examination to the Commissioner, as, in the judgment of the Commissioner, reasonably bear upon the extent to which a mortgage lender is complying with the requirements of fair lending laws and helping to meet the mortgage loan credit needs of communities in the Commonwealth.

CRA examination procedures were used to evaluate Leader Mortgage's community investment performance. These procedures utilize two performance tests: the Lending Test and the Service Test. This evaluation considered Leader Mortgage's lending and community development activities for the period of January 2012 through September 2014. The data and applicable timeframes for the Lending Test and the Service Test are discussed below.

The Lending Test evaluates the Lender's community investment performance pursuant to the following five criteria: geographic distribution of loans, lending to borrowers of different incomes, innovative and flexible lending practices, fair lending, and loss of affordable housing.

Home mortgage lending for 2012 and 2013 is presented in the geographic distribution, lending to borrowers of different incomes and the Minority Application Flow tables. Comparative analysis of the Lender's lending performance for 2012 and 2013 are provided because it is the most recent years for which aggregate HMDA lending data is available. The aggregate lending data is used for comparison purposes within the evaluation and is a measure of loan demand. It includes lending information from all HMDA reporting lenders which originated loans in the Commonwealth of Massachusetts. Home mortgage lending data for 2014 is referenced in the narrative to illustrate trends in Leader Mortgage's lending data.

In addition to gathering and evaluating statistical information relative to a mortgage lender's loan volume, the CRA examination also reflects an in depth review of the entity's mortgage lending using qualitative analysis, which includes, but is not limited to: an assessment of the suitability and sustainability of the mortgage lender's loan products by reviewing the lender's internally maintained records of delinquencies and defaults as well as information publicly available and through other sources available to the examination team. The examination included inspection of individual loan files for review of compliance with consumer protection provisions and scrutiny of these files for the occurrence of disparate treatment based on a prohibited basis.

The Service Test evaluates the mortgage lender's record of helping to meet the mortgage credit needs by analyzing the availability and effectiveness of a mortgage lender's systems for delivering mortgage loan products, the extent and innovativeness of its community development services, and, if applicable, loss mitigation services to modify loans and/or efforts to keep delinquent home borrowers in their homes.

MORTGAGE LENDER'S CRA FOR MORTGAGE LENDERS RATING:

This mortgage lender is rated "Needs to Improve."

Leader Mortgage demonstrated:

- A less than adequate geographic distribution of loans, particularly to low- and moderate-income geographies, in the Commonwealth;
- A less than adequate distribution of loans among individuals of different income levels, given the product lines offered by the mortgage lender;
- Limited use of innovative or flexible lending practices in a safe and sound manner to address the mortgage credit needs of low- and moderate-income individuals or geographies, including loans and other products to assist delinquent home mortgage borrowers to be able to remain in their homes;
- An adequate record relative to fair lending policies and practices;
- Leader Mortgage offers community development services and donations within the Commonwealth.

PERFORMANCE CONTEXT

Description of Mortgage Lender

Leader Mortgage was established in the Commonwealth of Massachusetts in 1986 and granted a license by the Division in 1992. Leader Mortgage's office is located at 180 Massachusetts Avenue in Arlington. Besides Massachusetts, the Lender is licensed to do business New Hampshire and Florida.

Leader Mortgage offers a variety of mortgage loan products to meet the needs of the Commonwealth's borrowers. Leader Mortgage is an approved lender for the Federal Housing Administration and offers a selection of MassHousing products.

All underwriting and major functions in the loan process are done at Leader Mortgage's office. Approved loans are funded through established warehouse lines of credit. Leader Mortgage's business development relies primarily on referrals and repeat customers. Originated loans are closed in Lender's name and sold immediately to secondary market investors, with servicing rights released, except retained servicing for loans sold directly to FNMA.

Demographic Information

The CRA regulation requires mortgage lenders to be evaluated on their performance within the Commonwealth of Massachusetts. Demographic data is provided below to offer contextual overviews of economic climate along with housing and population characteristics for the Commonwealth of Massachusetts.

| 2010 CENSUS DEMOGRAPHIC INFORMATION | | | | | | |
|--|---------------|--|-------------------|-----------------|----------------|--------------|
| Demographic Characteristics | Amount | Low % | Moderate % | Middle % | Upper % | N/A % |
| Geographies (Census Tracts) | 1,474 | 10.8 | 20.0 | 40.7 | 27.1 | 1.4 |
| Population by Geography | 6,547,629 | 8.9 | 18.9 | 42.8 | 29.2 | 0.2 |
| Owner-Occupied Housing by Geography | 1,608,474 | 2.9 | 13.7 | 48.9 | 34.5 | 0.0 |
| Family Distribution by Income Level | 1,600,588 | 19.3 | 17.7 | 24.4 | 38.6 | 0.0 |
| Distribution of Low and Moderate Income Families | 592,420 | 7.7 | 18.4 | 43.6 | 30.3 | 0.0 |
| Median Family Income | \$86,272 | Median Housing Value | | | | 373,206 |
| Households Below Poverty Level | 11.1% | Unemployment Rate | | | | 5.6%* |
| 2012 HUD Adjusted Median Family Income | \$87,891 | 2013 HUD Adjusted Median Family Income | | | | \$84,208 |

Source: 2010 US Census

**as of 07/31/2014*

Based on the 2010 Census, the Commonwealth's population stood at 6.5 million people with a total of 2.7 million housing units. Of the total housing units, 1.6 million or 57.7 percent are owner-occupied, 904,078 or 32.5 percent are rental-occupied, and 9.8 percent are vacant units.

According to the 2010 Census there are 2.5 million households in the Commonwealth with a median household income of \$69,101. Over 39 percent of the households are now classified as low and moderate-income. In addition, over 11 percent of the total number of households are living below the poverty level. Individuals in these categories may find it challenging to qualify for traditional mortgage loan products.

Households classified as ‘families’ totaled slightly over 1.6 million. Of all family households, 19.3 percent were low-income, 17.7 percent were moderate-income, 24.4 percent were middle-income, and 38.6 percent were upper-income. The median family income according to the 2010 census was \$86,272. The Housing and Urban Development (HUD) adjusted median family income is \$87,891 in 2012 and \$84,208 in 2013. The adjusted median family income is updated yearly and takes into account inflation and other economic factors.

The Commonwealth of Massachusetts contained 1,474 Census tracts. Of these, 160 or 10.8 percent are low-income; 295 or 20.0 percent are moderate-income; 600 or 40.7 percent are middle-income; 399 or 27.1 percent are upper-income; and 20 or 1.4 percent are NA or have no income designation. The tracts with no income designation are located in areas that contain no housing units and will not be included in this evaluation since they provide no lending opportunities. These areas are made up of correctional facilities, universities, military installations, and uninhabited locations such as the Boston Harbor Islands.

Low-income is defined as individual income that is less than 50 percent of the area median income. Moderate-income is defined as individual income that is at least 50 percent and less than 80 percent of the area median income. Middle-income is defined as individual income that is at least 80 percent and less than 120 percent of the area median income. Upper-income is defined as individual income that is more than 120 percent of the area median income.

The median housing value for Massachusetts was \$373,206 according to the 2010 Census. The unemployment rate for the Commonwealth of Massachusetts stood at 5.6 percent as of July 31, 2014, which was a decrease from July of 2013 when the unemployment rate was at 7.2 percent. Employment rates would tend to affect a borrower’s ability to remain current on mortgage loan obligations and also correlates to delinquency and default rates.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Leader Mortgage's lending efforts are rated under the five performance criteria: Geographic Distribution, Borrower Characteristics, Innovative or Flexible Lending Practices, Fair Lending Policies and Procedures, and Loss of Affordable Housing. The following information details the data compiled and reviewed, as well as conclusions on the mortgage lending of Leader Mortgage.

Leader Mortgage's Lending Test performance was determined to be "Needs to Improve" at this time.

I. Geographic Distribution

The geographic distribution of loans was reviewed to assess how well Leader Mortgage is addressing the credit needs throughout the Commonwealth of Massachusetts' low, moderate, middle, and upper-income Census tracts.

The following table shows, by number, HMDA reportable loans in low, moderate, middle and upper-income geographies in comparison to the aggregate and the percentage of owner-occupied housing units in each of the Census tract income categories.

| <i>Distribution of HMDA Loans by Income Category of the Census Tract</i> | | | | | | | |
|---|--|---|------------------------------------|---------------------|---|------------------------------------|---------------------|
| <i>Census Tract Income Level</i> | <i>Total Owner-Occupied Housing Units</i> | <i>2012 Aggregate Lending Data</i> | <i>2012 Leader Mortgage</i> | | <i>2013 Aggregate Lending Data</i> | <i>2013 Leader Mortgage</i> | |
| | <i>%</i> | <i>% of #</i> | <i>#</i> | <i>%</i> | <i>% of #</i> | <i>#</i> | <i>%</i> |
| <i>Low</i> | 2.9 | 2.1 | 19 | 0.9 | 2.9 | 19 | 1.9 |
| <i>Moderate</i> | 13.7 | 10.2 | 163 | 7.9 | 12.3 | 100 | 10.1 |
| <i>Middle</i> | 48.9 | 45.2 | 808 | 39.1 | 46.1 | 367 | 37.0 |
| <i>Upper</i> | 34.5 | 42.5 | 1,078 | 52.1 | 38.7 | 507 | 51.0 |
| <i>Total</i> | <i>100.0</i> | <i>100.0</i> | <i>2,068</i> | <i>100.0</i> | <i>100.00</i> | <i>993</i> | <i>100.0</i> |

Source: 2012 & 2013 HMDA LAR Data and 2010 U.S. Census Data.

As reflected in the above table, of the total 2,068 loans originated in 2012, 8.80 percent were in the low- and moderate-income geographies. The percentages in each category were below the percentage of the area's owner occupied housing units in low and moderate-income level geographies, as well as the aggregate lending percentages.

The highest concentration of residential loans was originated in the middle and upper-income census tracts in 2012 and 2013. Given that 83.4 percent of the area's owner-occupied housing units are in middle- and upper-income level census tracts, it is reasonable to find the majority of loans originated within these designated census tracts.

Due to current economic environment, Leader Mortgage's overall loan volume decreased significantly from 2012 to 2013. While the percentage of lending in low- and moderate-income census tracts improved to 12.0 percent, the percentage continued below the aggregate and demographics. A preliminary review of the interim data for 2014 showed 9.5 percent of loans were originated in low- and moderate-income geographies, revealing a negative lending trend from 2013 to 2014.

Overall, the geographic distribution of residential mortgage loans reflects a less than adequate dispersion throughout low- and moderate-income level census tracts within the Commonwealth.

II. Borrower Characteristics

The distribution of loans by borrower income levels was reviewed to determine the extent to which the Lender is addressing the credit needs of the Commonwealth's residents.

The following table shows Leader Mortgage's 2012 and 2013 HMDA-reportable loans to low, moderate, middle, and upper-income borrowers in comparison to aggregate data (exclusive of Leader Mortgage) and the percentage of total families within the Commonwealth in each respective income group.

| <i>Distribution of HMDA Loans by Borrower Income</i> | | | | | | | |
|---|------------------------------|---|------------------------------------|-----------------|---|------------------------------------|-----------------|
| <i>Census Tract Income Level</i> | <i>Total Families</i> | <i>2012 Aggregate Lending Data</i> | <i>2012 Leader Mortgage</i> | | <i>2013 Aggregate Lending Data</i> | <i>2013 Leader Mortgage</i> | |
| | <i>%</i> | <i>% of #</i> | <i>#</i> | <i>%</i> | <i>% of #</i> | <i>#</i> | <i>%</i> |
| <i>Low</i> | 19.3 | 5.2 | 45 | 2.2 | 5.4 | 13 | 1.3 |
| <i>Moderate</i> | 17.8 | 15.7 | 210 | 10.1 | 15.9 | 100 | 10.1 |
| <i>Middle</i> | 24.4 | 23.2 | 568 | 27.5 | 22.9 | 224 | 22.5 |
| <i>Upper</i> | 38.5 | 42.6 | 1,236 | 59.8 | 43.7 | 653 | 65.8 |
| <i>N/A</i> | 0.0 | 13.3 | 9 | 0.4 | 12.1 | 3 | 0.3 |
| <i>Total</i> | 100.0 | 100.0 | 2,068 | 100.0 | 100.0 | 993 | 100.0 |

Source: 2012 & 2013 YTD HMDA LAR Data and 2010 U.S. Census Data.

As shown in the above table, the percentage of lending to low- and moderate-income borrowers during 2012 and 2013 was below the aggregate during that time period, and considerably below the percentage of low-income families.

Lending to low-income borrowers decreased from 2012 to 2013, and the Lender's overall lending performance to low- and moderate-income level borrowers remains at modest levels. The decreasing trend also appears to be supported by a preliminary review of the interim data for 2014 that indicates only 8.7 percent of loans were originated to low- and moderate-income borrowers in the Commonwealth. Lending by borrower income during the examination period does not meet the standards for satisfactory performance.

III. *Innovative or Flexible Lending Practices*

Leader Mortgage offers two types of flexible lending products, which are provided in a safe and sound manner to address the credit needs of low- and moderate-income individuals or geographies.

Leader Mortgage became a Housing and Urban Development direct endorsement mortgage lender in 2008 for Federal Housing Administration (FHA) insured mortgages. FHA products provide competitive interest rates, smaller down payments for low- and moderate-income first time homebuyers and existing homeowners. During the review period from January 2012 to September 2014, Leader Mortgage originated 18 loans totaling \$6.2 million. Of these, four loans benefited moderate-income level consumers, while one loan was originated in a moderate-income census tract. No FHA loans were originated for low-income individuals or geographies.

Leader Mortgage also offers Massachusetts Housing Finance Agency (MassHousing) products. MassHousing is a self-supporting not-for-profit public agency that provides financing for homebuyers and homeowners, and for developers and owners of affordable rental housing. The agency sells bonds to fund its programs, which include the 'My Community' program. This loan program offers 30 year fixed rate loans, loan limits as high as \$417,000 with the borrower's income limit up to \$110,700 and no down payment requirements. During the period from January 2012 to September 2014, Leader Mortgage originated 45 MassHousing loans with a total of \$13.25 million in dollar volume.

IV. *Fair Lending*

The Division examines a mortgage lender's fair lending policies and procedures pursuant to Regulatory Bulletin 1.3-106. The mortgage lender's compliance with the laws relating to discrimination and other illegal credit practices was reviewed, including the Fair Housing Act and the Equal Credit Opportunity Act. The review included, but was not limited to, review of written policies and procedures, interviews with Leader Mortgage's personnel, and individual file review. No evidence of disparate treatment was identified.

Leader Mortgage has established an adequate record relative to fair lending policies and practices. Leader Mortgage incorporates fair lending company-wide into policy and procedures which apply to all employees. Employees are instructed not to discriminate against loan applicants on a prohibited basis. Mortgage loan officers are required to complete continuing education according to NMLS requirements and all staff are required to participate in periodic on-line compliance courses, in addition to any required agency specific or investor specific training. Management also attends various courses offered by the Massachusetts Mortgage Bankers Association.

In addition, Leader Mortgage conducts staff meetings that include a review of the existing HMDA and ECOA guidelines and address any changes to ensure compliance. Staff members are encouraged to attend CRA and Fair Lending seminars offered by various sources. Senior management is responsible for ensuring compliance with current laws and regulations, and for making necessary changes and updates to policies and procedures. Leader Mortgage contracts with external vendors to conduct annual audits and monthly reviews for compliance with regulatory requirements, including CRA and Fair Lending.

MINORITY APPLICATION FLOW

For 2012 and 2013 Leader Mortgage received 3,422 HMDA-reportable loan applications from within the Commonwealth of Massachusetts. Of these applications, 1,317 or 38.5 percent were received from racial minority applicants, of which 1,177 or 89.4 percent resulted in originations. Leader Mortgage received 71 or 2.1 percent of HMDA reportable applications from ethnic groups of Hispanic origin within its assessment area, of which 59 or 83.1 percent were originated. This compares to 89.5 percent overall ratio of mortgage loans originated by the Lender in Massachusetts, and the 74.6 percent for the ratio of the aggregate.

Demographic information for Massachusetts reveals the total ethnic and racial minority population stood at 23.9 percent of the total population as of the 2010 Census. This segment of the population is comprised of 9.6 percent Hispanic or Latino ethnicities. At 14.3 percent, racial minorities consisted of 6.0 percent Black; 5.3 percent Asian/Pacific Islander; 0.2 percent American Indian/Alaskan Native; and 2.8 percent self-identified as Other Race.

Refer to the following table for information on the mortgage lenders' minority loan application flow as well as a comparison to aggregate lending data throughout the Commonwealth of Massachusetts. The comparison of this data assists in deriving reasonable expectations for the rate of applications the mortgage lender received from minority applicants.

| MINORITY APPLICATION FLOW | | | | | |
|---------------------------------------|---------------------------------|--------------|--------------------------------|---------------------------------|--------------|
| RACE | 2012 Leader Mortgage | | 2013 Aggregate Data | 2013 Leader Mortgage | |
| | # | % | % of # | # | % |
| <i>American Indian/ Alaska Native</i> | 0 | 0.0 | 0.2 | 1 | 0.1 |
| <i>Asian</i> | 806 | 35.4 | 4.8 | 401 | 35.1 |
| <i>Black/ African American</i> | 8 | 0.3 | 2.4 | 5 | 0.4 |
| <i>Hawaiian/Pacific Islander</i> | 1 | 0.1 | 0.1 | 0 | 0.0 |
| <i>2 or more Minority</i> | 0 | 0.0 | 0.0 | 0 | 0.0 |
| <i>Joint Race (White/Minority)</i> | 67 | 2.9 | 1.2 | 28 | 2.4 |
| Total Minority | 882 | 38.7 | 8.7 | 435 | 38.0 |
| <i>White</i> | 1,394 | 61.2 | 69.5 | 709 | 62.0 |
| <i>Race Not Available</i> | 2 | 0.1 | 21.8 | 0 | 0.0 |
| Total | 2,278 | 100.0 | 100.0 | 1,144 | 100.0 |
| ETHNICITY | | | | | |
| <i>Hispanic or Latino</i> | 19 | 0.8 | 2.8 | 18 | 1.6 |
| <i>Not Hispanic or Latino</i> | 2,238 | 98.3 | 74.7 | 1,110 | 97.0 |
| <i>Joint (Hisp-Lat /Not Hisp-Lat)</i> | 18 | 0.8 | 0.9 | 16 | 1.4 |
| <i>Ethnicity Not Available</i> | 3 | 0.1 | 21.6 | 0 | 0.0 |
| Total | 2,278 | 100.0 | 100.0 | 1,144 | 100.0 |

Source: PCI Corporation CRA Wiz, Data Source: 2000 U.S. Census Data, 2012 & 2013 HMDA Data

The Lender's minority application flow was considerably above the population demographics for Asian applicants derived from the census data, while below the census data for Black and Latino applicants. In regard to peer lending data, the figures for racial and ethnic minority applicants were comparable to the performance of the aggregate, again with a notable exception of Asian consumers, whose ratio at Leader Mortgage far exceeds all criteria. A preliminary review of the interim data for 2014 indicates continuation of these trends, with 37.3 percent of applications received from the Asian population and 3.7 percent of applications coming from other racial minorities. Applications generated from ethnic minorities stood at 3.5 percent.

V. Loss of Affordable Housing

This review concentrated on the suitability and sustainability of mortgage loans originated by Leader Mortgage by taking into account delinquency and default rates of the Lender and those of the overall marketplace. Information provided by the Lender was reviewed, as were statistics available on delinquency and default rates for mortgage loans. Additionally, individual mortgage loans could be tracked for their status through local Registries of Deeds and other available sources, including public records of foreclosure filings.

An extensive review of information and documentation, from both internal and external sources as partially described above, did not reveal lending practices or products that showed an undue concentration or a systematic pattern of lending, including a pattern of early payment defaults, resulting in the loss of affordable housing units. Overall delinquency rate stands at nearly zero percent.

SERVICE TEST

The service test evaluates a mortgage lender's record of helping to meet the mortgage credit needs in the Commonwealth by analyzing both the availability and effectiveness of a mortgage lender's systems for delivering mortgage loan products; the extent and innovativeness of its community development services; and loss mitigation services to modify loans or otherwise keep delinquent home loan borrowers in their homes. Community development services must benefit the Commonwealth or a broader regional area that includes the Commonwealth.

Leader Mortgage's Service Test performance was determined to be "High Satisfactory" at this time.

Mortgage Lending Services

Leader Mortgage provides an effective delivery of mortgage lender services that are accessible to geographies and individuals of different income levels in the Commonwealth. Customers can apply to Leader Mortgage for a mortgage loan over the telephone and via the company's website, or at the office location situated in a middle-income geography at 180 Massachusetts Avenue in Arlington. Business development relies primarily on referrals and repeat customers. Leader Mortgage does minimal advertising in Massachusetts.

Leader Mortgage currently maintains a loan servicing portfolio of approximately 1,400 accounts, sub-serviced by Bank Newport. The performance review indicates negligible delinquency ratios. During the examination review period, three loans underwent modifications of terms.

Community Development Services

A community development service is a service that:

- (a) has as its primary purpose community development; and
- (b) is related to the provision of financial services, including technical services

The Commissioner evaluates community development services pursuant to the following criteria:

- (a) the extent to which the mortgage lender provides community development services; and
- (b) the innovativeness and responsiveness of community development services.

Since the prior examination, Leader Mortgage organized eight HomeBuyer Workshops aimed at introducing various mortgage loan options, including FHA and MassHousing products. Six of these workshops were presented at the Lender's office in Arlington, a middle-income geography, the other two in Beverly and Watertown, upper and middle-income geographies, respectively.

The four workshops that Leader Mortgage sponsored for Allston Brighton Community Development Corporation in 2012-2014, featured Lender's Assistant Vice President as a presenter. One of these presentations was conducted in Spanish.

During the examination period, Leader Mortgage's Chairman and CEO served as board member on the FNMA Eastern Region Advisory Board and the FNMA National Affordable Housing Advisory Council, and was a member of the Massachusetts Home Ownership Advisory Committee.

Qualified Investments

A Qualified Investment for the purposes of this CRA evaluation is a lawful investment, deposit, membership share, or grant that has as its primary purpose community development. The evaluation considered (1) the number of investments and grants, (2) the extent to which community development opportunities have been made available to the institution, and (3) the responsiveness of the institution's community development grants to the assessment area's needs.

During the examination review period, Leader Mortgage donated \$16,675 in qualified community development investments supporting first time homebuyer programs offered by the Allston-Brighton Community Development Corporation, Supporting Mentors, and Medford Community Housing.

Leader Mortgage made deposits totaling \$2.5 million into a Minority Depository Institution, Leader Bank, during the evaluation period.

An additional \$3,900 was donated to various efforts to support families and individuals facing homelessness in their struggle to find and retain affordable housing. The organizations receiving these donations included Massachusetts Affordable Housing Alliance, Cambridge Housing Assistance Fund, Metropolitan Boston Housing Partnership, Asian Women for Health, and Pine Street Inn.

PERFORMANCE EVALUATION DISCLOSURE GUIDE

Massachusetts General Laws Chapter 255E, Section 8, and 209 CMR 54.00, the CRA regulation, requires all mortgage lenders to take the following actions within 30 business days of receipt of the CRA evaluation of their mortgage lender:

- 1) Make its most current CRA performance evaluation available to the public.
- 2) Provide a copy of its current evaluation to the public, upon request. In connection with this, the mortgage lender is authorized to charge a fee which does not exceed the cost of reproduction and mailing (if applicable).

The format and content of the mortgage lender's evaluation, as prepared by the Division of Banks, may not be altered or abridged in any manner. The mortgage lender is encouraged to include its response to the evaluation in its CRA public file.

The Division of Banks will publish the mortgage lender's Public Disclosure on its website no sooner than 30 days after the issuance of the Public Disclosure.